



ANDREW O. ISAR

4304 92<sup>ND</sup> AVENUE NW  
GIG HARBOR, WA 98335  
TELEPHONE: 253.851.6700  
FACSIMILE: 866.474.3630  
WWW.MILLERISAR.COM

*Via Electronic Comment Filing System and Overnight Delivery*

September 1, 2017

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

ATTN: Consumer and Governmental Affairs Bureau

RE: *Structure and Practices of the Video Relay Service program*, CG Docket No. 10-51:  
*Telecommunications Relay Services and Speech-to-Speech Services for Individuals with  
Hearing and Speech Disabilities*, CG Docket No. 03-123, ASL Services Holdings, LLC  
dba GlobalVRS Notice of Conditional Intent for Skills-Based Routing and Deaf  
Interpreter Trial Participation and Request for Extension of Time for Trial Initiation

Dear Secretary Dortch:

Pursuant to Section F(3), Participation in the [At-Home VRS Call Handling] Pilot Program of the Commission's *Report and Order on VRS Improvements* in the above referenced matter,<sup>1</sup> and Section 64.604(b)(8) of the Commission's rules,<sup>2</sup> ASL Services Holdings, LLC dba GlobalVRS ("GlobalVRS") hereby notifies the Commission of its intent to participate in the Commission's voluntary at-home video relay service ("VRS") call handling pilot program beginning November 1, 2017. In conjunction with this notice, GlobalVRS submits the attached detailed confidential plan demonstrating that GlobalVRS intends to achieve compliance with the mandatory minimum standards applicable to VRS associated with this program, as set forth in Section 64.604(b)(8) for Commission approval. A separate supporting file is included in the CD-ROMs attached to the confidential versions of this submission.

**Request for Confidential Treatment. Request for Confidential Treatment.** Pursuant to Section 0.459 of the Commission's rules, and "Exemption 4" of the Freedom of Information Act, GlobalVRS respectfully requests that the entirety of its At-Home VRS Call Handling Pilot Program Compliance Plan ("Plan") be deemed confidential and protected, accordingly. Plan provided in GlobalVRS' constitutes "trade secrets" as set forth in Section 0.457 of the Commission's rules, in that the Plan reveals

---

<sup>1</sup> *Structure and Practices of the Video Relay Service program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. CG Docket No. 10-51 and 03-123, *Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking and Order*, FCC 17-26 (rel. March 23, 2017).

<sup>2</sup> 47 C.F.R. §64.604(b)(8).

Ms. Marlene Dortch  
September 1, 2017  
Page 2

information regarding Company operations that would be useful to competitors. Further, the Plan is not intended for public consumption. GlobalVRS would not otherwise make this Plan publically available under any circumstance. Release of this Plan to the public could cause GlobalVRS irreparable and inestimable harm.

GlobalVRS requests that the Plan be withheld from public inspection, accordingly. Should disclosure of the Plan be requested, GlobalVRS requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

In support of its request and pursuant to Section 0.459(b) of the Commission's rules, Global VRS states as follows:

**1. Identification of the specific information for which confidential treatment is sought.**

GlobalVRS requests confidential treatment of its At-Home VRS Call Handling Pilot Program Compliance Plan.

**2. Identification of the circumstances giving rise to the submission.**

GlobalVRS is providing this information in compliance with 47 C.F.R. §64.604(b)(8).

**3. Explanation of the degree to which the information is commercial or financial or contains trade secret or is privileged.**

The Plan constitutes highly confidential operations information that could be useful to competing entities. This information is safeguarded from competitors and is not made to the public accordingly.

**4. Explanation of the degree to which the information concerns a service that is subject to competition**

The Plan involves video relay services, a highly competitive service served by an exceptionally limited number of providers.

**5. Explanation of how disclosure of the information could result in competitive harm.**

Disclosure of the Plan could cause substantial competitive harm to GlobalVRS, because other video relay service providers would gain access to critical operations information and be able to assess the Company's organization, structure, and nature of its current and future operations; information that would be useful in competing against GlobalVRS and undermine the Company's ability to compete in the provision of video relay services as well as video remote interpreting.

**6. Identification of any measures taken to prevent unauthorized disclosure.**

GlobalVRS has ensured that such Plan is not disclosed to competitors, the public, or third parties.

Ms. Marlene Dortch  
September 1, 2017  
Page 3

**Identification of whether the information is available to the public and the extent to of any previous disclosures of information to third parties.**

Global VRS does not make the Plan to the public or to third parties.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

This Plan is being submitted by GlobalVRS. GlobalVRS requests that the Plan provided in its response generally be treated as confidential indefinitely as the Company cannot identify a date certain by which this information could be disclosed without causing irreparable competitive harm to GlobalVRS.

In accordance with the Commission's May 31, 2012 Second Protective Order in the above-referenced proceeding, DA 12-858, an original and one (1) copy of this letter and attachment and two (2) redacted copies of this letter are enclosed. Two confidential copies of this letter have been sent via U.S. Mail to Mr. Eliot Greenwald, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554.

Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of reports required by the telecommunications relay service rules, a confidential version, and separate public version are being submitted electronically to TRSreports@fcc.gov. A public inspection copy has been filed with in the Commission's electronic comment filing system.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

/s/ Andrew O. Isar

Andrew O. Isar

Regulatory Consultants to  
ASL Services Holdings, LLC dba GlobalVRS

Attachment

cc: TRSreports@fcc.gov